

Pennsylvaria: Deparement of Environment to Protection

909 Elmerton Avenue Harrisburg, PA 17110-8200

June 24, 2004

Southcentral Regional Office

SDMS DociD 2050644

717-705-4949 FAX-717-705-4930

Mr. Mike Bedard, P.E. Arcadis G & M, Inc. 6 Terry Drive, Suite 300 Newtown, PA 18940

Re: Public Water Supply/Bally Borough
Hydrogeologic Report Requirements
Farm Well Sites
Washington Township, Berks County

Dear Mr. Bedard:

I am writing in response to your recent correspondence, those dated May 25. May 27, June 4, 2004. I also want to comment on a June 10, 2004 letter from Peffer Geotechnical Corporation (PGC), consultant to Bally Borough.

I have reviewed my PWS file of the Bally Borough case and I have spent some time reviewing the HSCA files on the Bally clean-up. The geologic and hydrogeologic particulars of the Bally area are complex. One thing that seems clear to me is that the plume associated with the American Household Incorporated site has moved, naturally or by induced stress, in a north and easterly direction. Lay a scale on Drawing No. 2 of your May 25, 2004 letter and BES, Well No. 3, Well No. 1, the South Well (SH-PB) and the Shuhler Private well line up in a northeasterly direction.

Your letters seek to justify the Farm South location for a new public water supply well for the Borough of Bally water system. I don't see anything in your letters that lessen the concerns that I mentioned in my letter dated April 13, 2004. I disagree with your assessment of fracture separation. I disagree that the lack of response in the observation network due to the 48-hour test indicates a limited potential for hydraulic influence. And, I disagree that the QuickFlow model illustrated on Figure 2 of your June 4, 204 letter accurately portrays the Zone of Contribution for SH-PB and golf course wells pumping together.

The concerns that we have discussed are not easily resolved and may not become evident until well after the South site has been in operation. At that point the concerns will have become Bally Borough's responsibility to resolve. If you proceed to develop the SH-PB well it seems incumbent to have the concurrence of the Borough. I agree with the June 10, 2004 assessment by PGC that..."a more convincing demonstration of a lack of even subtle drawdown in the area of the plume..." is necessary. As previously mentioned, I'm anxious to see the aquifer test addendum mentioned in your May 27 letter.

Thank you for your correspondence. Call with questions and please keep me informed as you proceed.

Sincerely,

H. Thomas Fridirici, P.G.

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Hydrogeologist

Water Supply Management Program

cc: Foni Hemerka, Bally Borough Alysa Suero, DRBC Mitch Cron, US EPA Asuquo Effiong, PA DEP